

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DAVID SIMMONS,

Plaintiff,

Case No. 2:10-cv-11857
Honorable Bernard A. Friedman

vs.

STATE FARM INSURANCE COMPANY,

Defendant.

CARL COLLINS, III (P55982)
Attorney for Plaintiff
18100 Meyers
Suite 392
Detroit, MI 48235
(313) 341-4100

SECREST WARDLE
NATHAN J. EDMONDS (P51453)
Attorney for Defendant
94 Macomb Place
Mt. Clemens, MI 48043
(586) 465-7180
(586) 465-0673 (Fax)

SECUREST WARDLE

DEFENDANT'S WITNESS LIST

NOW COMES Defendant, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, by and through its attorneys, SECUREST WARDLE, and for its list of witnesses who may be called upon at the time of trial, states as follows:

1. David Simmons
c/o Plaintiff's counsel
2. Renae Campau
c/o Defense counsel
3. Clifford F. Furgison, Ph.D. (*Expert*)
5700 E. Eleven Mile Road
Warren, MI 48091
4. Zachary Endress, M.D. (*Expert*)
5700 E. Eleven Mile Road
Warren, MI 48091

5. Any and all representatives and/or records custodians of:

- a. State Farm Insurance Company
- b. Detroit Receiving Hospital
- c. Macomb Orthopedic Surgeons
- d. Kresge Eye Institute
- e. Forest Park Clinic
- f. Bio-Magnetic Imaging Center
- g. Rehab Alliance, P.C.
- h. Associated Chiropractic Clinics
- i. Liberty Mutual Ins. Co.
- j. Hanover Ins. Co.
- k. Amerisure Ins. Co.

6. Rebuttal witnesses as may be necessary.

7. All witnesses, including expert witnesses, named on Plaintiff's Witness List and Supplemental or Amended Witness List.

8. Any and all doctors who have treated Plaintiff(s) in the past or who will treat Plaintiff(s) between now and at the time of Trial.

9. All witnesses disclosed in discovery, in Answers to Interrogatories, in deposition and at Case Evaluation or otherwise.

10. Any and all police officers who investigated the accident involved in this lawsuit.

11. Any and all witnesses to the accident.

12. If the Defendant sent or will be sending Plaintiff(s) to an independent medical examination, Defendant would reserve the right to call the examining physician as a witness in this case.

13. Any and all doctors and nurses who have treated Plaintiff(s), who have taken a history from the Plaintiff(s), who have performed any tests upon the Plaintiff(s), or who have interpreted any tests performed upon the Plaintiff(s).

14. Additional experts whose areas of expertise may become relevant as issues are developed during the course of ongoing discovery and investigation.

15. Defendant reserves the right to amend its Witness List as discovery continues in this matter and witnesses become evident up to and including the time of Trial.

SECREST WARDLE

By: Nathan J. Edmonds
NATHAN J. EDMONDS (P51453)
Attorney for Defendant
94 Macomb Place
Mt. Clemens, MI 48043-5651
(586) 465-7180

DATED: October 1, 2010

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— SECUREST WARDLE —

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SECRET WARDLE

CERTIFICATE OF SERVICE

STATE OF MICHIGAN)
)ss
COUNTY OF MACOMB)

NATHAN J. EDMONDS, being first duly sworn, deposes and states that on the 1st day of October, 2010, he served a copy of ***Defendant State Farm's Witness List*** by way of electronic transmission via the CM/ECF Online Case Submission.

SECRET WARDLE

/s/Nathan J. Edmonds

NATHAN J. EDMONDS (P51453)
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94 Macomb Place
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